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January 4, 2018

Via ECF and Facsimile

The Honorable George B. Daniels
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 1310
New York, NY 10007

Re: *In re Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)
Reply Brief Filings for Case Initiated After Motions to Dismiss

*Muenchener Rueckversicherungs-Gesellschaft Aktiengesellschaft in Muenchen, et
al. v. Kingdom of Saudi Arabia, et al.*, 17-cv-7914 (GBD) (SN)

Dear Judge Daniels:

I write on behalf of Defendant Kingdom of Saudi Arabia ("Saudi Arabia") concerning the reply briefs filed earlier today by Saudi Arabia and Defendant Saudi High Commission (the "SHC") in support of their motions to dismiss the Consolidated Amended Complaint ("CAC"), MDL ECF Nos. 3667, 3670. The SHC also joins in this letter.

Plaintiffs in the *Muenchener* case, No. 17-cv-7914, have adopted the CAC's allegations against Saudi Arabia and the SHC by filing a Short Form Complaint. *See* MDL ECF No. 3755 (*Muenchener* Complaint). Accordingly, the *Muenchener* Plaintiffs will be bound by this Court's disposition of Saudi Arabia's and the SHC's motions to dismiss. *See* MDL ECF No. 3543 (Order Approving Notices to Conform and Short Form Complaints) at 4.

Because the *Muenchener* case was initiated after Saudi Arabia and the SHC filed their motions to dismiss on August 1, 2017, the original motions were not filed on the individual case docket, nor were the oppositions. Further, it appears that the *Muenchener* case has never formally been designated as a consolidated MDL case. As a result of these factors, Saudi Arabia and the SHC have been unable either to file their replies directly on the *Muenchener* docket or to spread their replies from the MDL docket to the *Muenchener* docket.

This letter confirms that the motions and replies are intended to apply to the *Muenchener* case, just as they apply to the other cases where plaintiffs have adopted the allegations of the

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CAC. Counsel for Saudi Arabia and the SHC are also serving electronic copies of the reply filings on counsel of record in *Muenchener*.

Respectfully submitted,

/s/ Michael K. Kellogg

Michael K. Kellogg
Counsel for the Kingdom of Saudi Arabia

cc: The Honorable Sarah Netburn (via ECF)
All MDL Counsel of Record (via ECF)